

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**Richard M. Zelma**

**Plaintiff**

**Vs.**

**Michael Peter Halperin, (“Halperin”)  
Individually, as owner, manager,  
founder and director of HFA Holdings  
LLP., d/b/a, IP Horizon Inc.,  
and;**

**Michael Peter Halperin, d/b/a HFA  
Holdings LLP. (“HFA”), a/k/a, d/b/a, IP  
Horizon Inc., SkyeTel, Call48,  
MHLHTH Holdings LLC., and all of  
Halperins currently unknown shell  
companies**

**and;**

**DOE Telemarketers (1-20), ABC  
Corporations’ (1-20), Resellers, Call-  
Centers, working with, benefiting  
from, participating in, affiliated or  
doing business with the named  
Defendants’; (Hereinafter “the  
Halperin Defs’.), each acting  
individually, in concert or as a group.**

**Defendants’**

CIVIL ACTION NO. 2:24-cv-01059 -ES-JRA

Removed from the Superior Court of  
New Jersey Law Division, Bergen County;

Original Docket No. BER-L- 5354-23

**NOTICE OF MOTION TO  
REMAND PLAINTIFFS COMPLAINT  
BACK TO STATE COURT**

**PLEASE TAKE NOTICE** that Plaintiff Richard M. Zelma has filed a Motion to Remand, pursuant to 47 U.S.C. §227 *et seq*; 28 U.S.C. §§1331, 1332, 1441 and 1446 *et seq* and all other applicable law, copies of which are attached hereto, with the United States District Court for the District of New Jersey.

/s/ Richard Zelma

RICHARD M. ZELMA

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Dated: March 8, 2024